

**BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001**

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|--|---|-------------------------|
| -----X                                   | : |                         |
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| <b>In the Matter of</b>                  | : |                         |
|  | : | <b>Docket No. R97-1</b> |
| <b>Postal Rate and Fee Changes, 1997</b> | : |                         |
|  | : |                         |
| -----X                                   | : |                         |

**NOTICE OF INTERVENTION BY  
THE BROOKLYN UNION GAS COMPANY**

The Brooklyn Union Gas Company ("Brooklyn Union") hereby gives notice of its intervention in the above-captioned proceeding in accordance with 39 U.S.C. § 3624 and Section 20 of the Commission's Rules of Practice, 39 C.F.R. § 3001.20. In support of its intervention, Brooklyn Union respectfully states:

1. Brooklyn Union designates the following persons to receive service in this proceeding:

Michael J. Finnegan  
Administrative Manager in  
Corporate Affairs  
The Brooklyn Union Gas Company  
One MetroTech Center  
Brooklyn, New York 11201

and

Michael W. Hall  
Cullen and Dykman  
1225 Nineteenth Street, N.W.  
Suite 320  
Washington, D.C. 20036

2. Brooklyn Union is a corporation duly organized and existing under the laws of the State of New York, with its principal office located at One MetroTech Center, Brooklyn, New York.

3. Brooklyn Union is engaged primarily in the purchase and distribution at retail of natural gas in a territory consisting of the Boroughs of Brooklyn and Staten Island and a portion of the Borough of Queens, all located within the City of New York and containing a population of approximately four million.

4. In connection with the provision of gas service, Brooklyn Union is a large user of mail services and incurs over \$5,500,000 annually in total postal charges, primarily for customers' billing and business reply mail.

5. On July 10, 1997, the United States Postal Service ("USPS") filed a request for recommended decision regarding a USPS proposal to change rates for postage and fees for postal service.

6. Brooklyn Union is committed to providing adequate gas service to its customers at the lowest reasonable cost. Increases in postal rates and fees generally have a negative impact on the rates Brooklyn Union charges gas consumers for services. In this case, however, Brooklyn Union is gratified that the USPSC has announced an innovative proposal to implement a 30-cent rate for prepaid envelopes used by customers to make bill payments and similar transactions. Accordingly, Brooklyn Union and the gas consumers it serves have a substantial interest in the outcome of this proceeding.

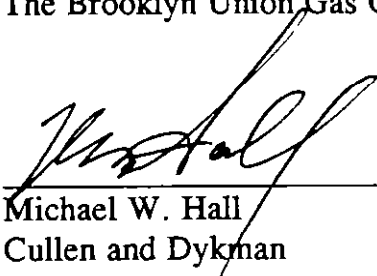
7. Brooklyn Union has a statutory interest in the matters to be heard and decided in this proceeding of such a nature that its intervention is necessary and appropriate. Brooklyn Union will not be adequately represented by any other party in this proceeding, and unless permitted to intervene and participate fully, may be bound or adversely affected by the Commission's decision herein without an opportunity to have its views heard and considered.

8. Brooklyn Union hereby indicates that it will be an active participant in this proceeding.

Respectfully submitted,

The Brooklyn Union Gas Company

By:

  
\_\_\_\_\_  
Michael W. Hall  
Cullen and Dykman  
1225 Nineteenth Street, N.W.  
Suite 320  
Washington, D.C. 20036  
(202) 223-8890

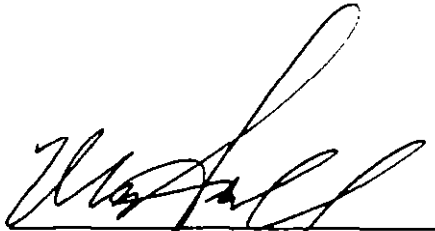
Dated: Washington, D.C.  
July 10, 1997

Of Counsel for  
The Brooklyn Union Gas Company

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon the United States Postal Service and W. Gail Willette, Acting Director of the Office of the Consumer Advocate in accordance with Section 12 of the Rules of Practice.

Dated at Washington, D.C., this 10 day of July, 1997.



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Michael W. Hall  
Cullen and Dykman  
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Suite 320  
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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY  
GARDEN CITY OFFICE  
1010 FRANKLIN AVENUE  
GARDEN CITY, NEW YORK 11530-0755  
(516) 741-0900

July 10, 1997

Hon. Charles L. Clapp  
Secretary  
Postal Rate Commission  
1333 H Street, N.W.  
Suite 300  
Washington, D.C. 20268-0001

**Re: Postal Rate and Fee Changes, 1997**  
**Docket No. R97-1**

Dear Mr. Crenshaw:

Enclosed for filing with the Commission in the referenced proceeding are an original and twenty-four (24) copies of a Notice of Intervention that is being filed by The Brooklyn Union Gas Company. Simultaneously, three (3) copies of Brooklyn Union's Notice of Intervention are being served upon Ms. W. Gail Willette, the Designated Officer of the Commission in this proceeding, and six (6) copies are being served upon the United States Postal Service.

Please acknowledge receipt of the enclosures by date-stamping and returning the designated copy to our messenger.

Thank you for your cooperation in this matter.

Very truly yours,



Michael W. Hall

Enclosures